REMARKS/ARGUMENTS

Introduction:

Claims 1, 15, 22, 23,31,35,37, 40, and 44 have been amended, and claims 6, 16-21, 32-34, and 39 have been cancelled without prejudice. Claims 1-5, 7-15, 22-31, 35-38, and 40-44 are pending in the application. Applicants respectfully request reexamination and reconsideration of the application.

Initially, Applicants confirm election of Group I claims, claims 1-15, 22-31, and 35-44. Applicants have cancelled nonelected claims 16-21 and 32-34 without prejudice.

Applicants acknowledge with appreciation the Examiner's indication that claims 23, 31, 37, 39-42, and 44 contain allowable subject matter. As discussed below, each of these claims has been rewritten in independent form, or the requirements of the claim have been written into a pending independent claim.

Claims 1-5 and 7-21:

Turning first to independent claim 1 and dependent claims 2-5 and 7-21 (all of which depend directly or indirectly from claim 1):

- Claims 1-3, 10, 11, and 15 were rejected as anticipated by US Patent No. 4,086,375 to La Chapelle, Jr. et al. ("La Chapelle");
- Claims 1, 13, and 14 were rejected as anticipated by US Patent No. 6,350,664 to Haji et al. ("Haji");
- Claims 1 and 6-9 were rejected as anticipated by US Patent No. 5,897,326 to Eldridge et al. ("Eldridge");
- Claim 4 was rejected as obvious in view of La Chapelle; and
- Claim 12 was rejected as obvious in view of Haji in combination with US Patent No. 5,824,177 to Yoshihara et al. ("Yoshihara").

Applicants respectfully traverse these rejections.

The requirement of original claim 6—that the elongate interconnect elements be resilient—has been written into claim 1, and claim 6 has been cancelled. Thus, independent claim 1 is now the same as original dependent claim 6.

Recognizing that La Chapelle and Haji do not teach or suggest *resilient*, elongate interconnect elements, the Examiner did not reject original claim 6 over either La Chapelle or

Haji. Rather, the Examiner rejected original claim 6 only in view of Eldridge. In rejecting original claim 6, the Examiner referred only to Figure 4F of Eldridge. In Figure 4F of Eldridge, however, spring contacts 430, which are attached to dice 402a and 402b, do not extend "into said space between said at least one die and an adjacent die" as required by independent claim 1 (as amended). Instead, Figure 4F of Eldridge shows spring contacts 430 disposed entirely within the boundaries of the die (402a or 402b) to which the spring contacts are attached.

Thus, independent claim 1, as amended, patentably distinguishes over La Chapelle and Haji because independent claim 1 now includes the "resilient" requirement of former dependent claim 6, and independent claim 1 distinguishes over Eldridge because the spring contacts 430 in Figure 4F of Eldridge do not extend into space between dice 402a and 402b. Therefore, independent claim 1 patentably distinguishes over La Chapelle, Haji, and Eldridge.

Dependent claims 2-5 and 7-21 depend from independent claim 1 and are therefore also patentable over the applied references.

Claims 22 and 24-30:

Turning next to independent claim 22 and dependent claims 24-30 (all of which depend directly or indirectly from claim 22):

- Claims 22, 29, and 30 were rejected as anticipated by Haji; and
- Claims 24-28 were rejected as obvious in view of Haji and Yoshihara.

Again, Applicants respectfully traverse these rejections.

Independent claim 22 requires that "packaging for one die [be] distinct and separate from packaging for another die." Independent claim 22 further requires that the step of "singulating said wafer into individual dice" occur after the step of forming packaging on the dice. In contrast, as shown in Figures 2(a)-(d) of Haji, Haji applies its resin layer 3, which the Examiner equates with packaging, as one solid piece of packaging prior to singulating the wafer 1. In other words, prior to singulating the wafer 1, the resin layer 3 does not form distinct and separate packaging for at least two dice. Therefore, independent claim 22 patentably distinguishes over Haji.

Dependent claims 24-30 depend from independent claim 22 and are therefore also patentable over the cited and applied references.

Claims 35, 36, 38, 43:

Turning next to independent claim 35 and dependent claims 36, 38, and 43 (all of which depend directly or indirectly from independent claim 35):

- Claims 35 and 43 were rejected as anticipated by US Patent No. 6,406,937 to Hedler; and
- Claims 36 and 38 were rejected as obvious in view of Hedler.

Applicants respectfully traverse these rejections.

The Examiner indicated that claim 39, which requires that the elongate interconnect elements be resilient, is allowable. Applicants have amended independent claim 35 to incorporate the requirements of claim 39 and cancelled claim 39. Thus, independent claim 35 now includes the requirements of claim 39. Independent claim 35 is therefore allowable.

Dependent claims 36, 38, and 43 depend (directly or indirectly) from independent claim 35 and are therefore also allowable.

Claims 23, 31, 37, 40-42, and 44:

As mentioned above, the Examiner indicated that claims 23, 31, 37, 40, and 44 would be allowable if rewritten in independent form. Applicants have rewritten these claims in independent form. Therefore, these claims, as well as claims 41 and 42 (which depend from independent claim 40), should be allowable.

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Conclusion:

In view of the foregoing, Applicants submit that all of the claims are allowable and the application is in condition for allowance. If the Examiner believes that a discussion with Applicants' attorney would be helpful, the Examiner is invited to contact the undersigned at (801) 536-6763.

Respectfully submitted,

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N. Kenneth Burraston

Reg. No. 39,923

Parsons, Behle & Latimer PLC P.O. Box 45898 201 South Main St., Suite 1800 Salt Lake City, Utah 84145-0898

Phone: (801) 536-6763 Fax: (801) 536-6111